

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In Re:	: Bankruptcy No. 1:20-02533
DALE R. PACKARD	: Chapter 13
Debtor	:
	:
FAY SERVICING LLC	:
Movant	:
vs.	:
	:
DALE R. PACKARD	:
Debtor/Respondent	:

ANSWER TO MOTION FOR RELIEF FROM STAY

AND NOW, comes the Debtor, Dale Packard, by and through his attorney, James H. Turner, Esquire and Answers the Motion for Relief from Stay filed by FAY SERVICING LLC as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.
9. Admitted.
10. Admitted.
11. Admitted.
12. Admitted. By further answer, debtor's home was in a fire and debtor must wait for insurance settlement to take place.

13. Admitted – Please refer to the answer above.
14. Admitted. Debtor would like to cure the arrearage with a six month stipulation.
15. Admitted. By further answer, pre-petition arrears are being paid their debtor's chapter 13 plan and debtor is wage attached so payments are made on time.
16. Admitted. By further answer, all arrearages are being paid through debtor's chapter 13 plan.
17. Denied. If debtor is allowed to cure the arrearage on the mortgage, there will be adequate protection.
18. Denied for reasons set forth above.
19. Admitted.
20. Denied for reasons set forth above.
21. Denied for reasons set forth above.
22. Denied for reasons set forth above.
23. Denied – please refer to the answer for question number 12.

WHEREFORE, Debtor/Respondent requests this Honorable Court deny the Movant's Motion for Relief From Stay and schedule a hearing on this matter at the Court's earliest possible convenience.

Respectfully submitted,
/s/ James H. Turner
James H. Turner
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CERTIFICATE OF SERVICE

I, James H. Turner, hereby certify that I served a true and correct copy of the foregoing by depositing a true and correct copy in the U.S. mail, first class postage prepaid, addressed, or e-mail as follows:

Zack N. Zaharopoulos, Trustee
8125 Adams Drive
Suite A
Hummelstown, PA 17036

Lorraine Gazzara Doyle, Esquire
Friedman Vartolo LLP
1325 Franklin Avenue, Suite 230
Garden City, New York 11530
Bankruptcy@FriedmanVartolo.com

Date: 8/3/21

/s/ James H. Turner
James H. Turner